

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION**

|                           |   |                             |
|---------------------------|---|-----------------------------|
| CYNTHIA K. HAYNES,        | ) |                             |
|                           | ) |                             |
| Plaintiff,                | ) |                             |
|                           | ) |                             |
| v.                        | ) | Cause No. 1:21-CV-00160-ACL |
|                           | ) |                             |
| JENNIFER WILLIAMS, et al. | ) |                             |
|                           | ) |                             |
| Defendants.               | ) |                             |

**CONSENT MOTION FOR BRIEFING SCHEDULE FOR PLAINTIFF'S RESPONSE  
AND DEFENDANTS' REPLY TO DEFENDANT WILLIAMS' MOTION FOR  
JUDGMENT ON THE PLEADINGS (PRESENTED BY PLAINTIFF)**

COMES NOW Plaintiff and moves this Court to set the below described briefing schedule, agreed upon by counsel for Plaintiff and for Defendant Williams, for the response and reply to Defendant Williams' Motion for Judgment on the Pleadings for the following reasons:

1. On February 27, 2023 Defendant Williams filed a Motion for Judgment on the Pleadings as to Count I of Plaintiff's Amended Complaint.

2. That Motion raises legal issues for which Plaintiff believes it would take more than the normally allotted time to adequately brief and respond to.

3. Plaintiff is requesting until March 16, 2023, fifteen (15) days from the date of filing this Motion, to file her response to Defendant Williams' Motion for Judgment on the Pleadings.

4. Counsel for Defendant Williams has consented to that extension of time.

5. At the same time, Counsel for Defendant requested that Plaintiff consent to an

extension until April 3, 2023 by when Defendant Williams will have to file a reply to Plaintiff's response. Because of defense counsel's travel for work and spring break she needs additional time to file her reply.

6. Plaintiff's counsel consented to requesting the Court grant that additional time for Defendant Williams' reply to be filed.

WHEREFORE, with the consent of both Plaintiff's counsel and counsel for Defendant Williams, both parties request that the Court grant Plaintiff until March 16, 2023 to respond to Defendant Williams' Motion for Judgment on the Pleadings and grant Defendant Williams' counsel until April 3, 2023 to file the Defendant Williams' reply and grant such other and further relief as the Court deems just under the circumstances herein.

Respectfully submitted,

/s/ Laurence D. Mass

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### **CERTIFICATE OF SERVICE**

It is hereby certified that on this 1st day of March 2023, a copy of the foregoing was filed electronically with the Clerk of the Court to be served to all counsel by operation of the Court's electronic filing system.

/s/ Laurence D. Mass